

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NOAH SAEEDY et al.,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

No. 2:23-cv-01104-BJR

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO THE COMPLAINT AND
EXTENDING INITIAL DISCOVERY
DEADLINES [DKT. 29]

Plaintiffs Noah Saeedy, Vishal Shah, Tina Wilkinson, and M.S. and Defendant Microsoft Corporation, by and through their respective counsel, stipulate and agree as follows:

1. Plaintiffs initiated this lawsuit on July 21, 2023, and served Microsoft with the Complaint and Summons on July 26, 2023.

2. The parties agree, subject to the Court's approval, that Microsoft may have until September 29, 2023 to respond to the Complaint by answer, a Rule 12 motion, and/or a motion to compel arbitration.

3. The parties further agree, subject to the Court's approval, that the deadlines set forth in the Court's Order Regarding Initial Disclosures and Joint Status Report FRCP 26(f) [Dkt. 29] shall be extended as follows, dated from the earlier of either when the Court's issues its

STIPULATION AND ORDER EXTENDING TIME
TO RESPOND TO COMPLAINT AND EXTENDING
INITIAL DISCOVERY DEADLINES [DKT. 29] (2:23-cv-01104-BJR) - 1

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Order on a responsive motion filed by Defendant or when the Defendant files its Answer: Rule 26 Conference (2 weeks after Order(s) or Answer); Initial Disclosures (4 weeks after Order(s) or Answer); Joint Status Report (6 weeks after Order(s) or Answer).

4. Good cause exists to extend the deadline to respond to the Complaint in order to provide Defendant additional time to consider the issues presented in the Complaint and for the parties to engage in the necessary meet and confer process required by the Court prior to the filing of any motion that may be dispositive in whole or part of the Complaint. Good cause exists to extend the initial discovery deadlines because it will conserve both the parties' and the Court's resources prior to a decision on a potential dispositive motion or an Answer by Defendants.

IT IS SO STIPULATED.

DATED this 7th day of September, 2023.

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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

DATED this _____ day of _____, 2023.

Honorable Barbara J. Rothstein